

KLINE & SPECTER, P.C.
1800 Chapel Avenue
Cherry Hill, New Jersey 08002
(856) 662-1180
Attorneys for Plaintiffs

CLERK
U.S. DISTRICT COURT

100 FEB 23 P 2:21

U.S. DISTRICT COURT
NEW JERSEY

DAISY LOVE,

Plaintiff,

v.

RANCOCAS HOSPITAL, et al

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CIVIL ACTION NO.: 01CV5456 (SMO)

**NOTICE OF MOTION FOR LEAVE TO AMEND COMPLAINT
TO ADD BETII BENN, R.N. AND BETH SLIMM, R.N. AS DEFENDANTS**

TO: Jennifer L. Parsons, Esquire
Sharon K. Galpern, Esquire
Stahl & DeLaurentis, P.C.
1103 Laurel Oak Road, Suite 103
Voorhees, NJ 08043

Timothy P. O'Brien, Esquire
Frank F. Calo, III, Esquire
Parker McCay & Criscuolo, P.C.
Three Greentree Centre, Suite 401
Marlton, NJ 08053

Jay J. Blumberg, Esquire
Michael Lindner, Esquire
Blumberg & Lindner
158 Delaware Street
Woodbury, NJ 08096

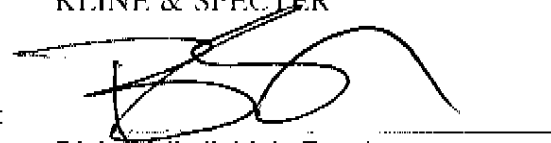
Benjamin H. Haftel, Esquire
Law Offices of Francis Schachtele
15 Millstone Road
Building 200, Suite 160
East Windsor, NJ 08520

PLEASE TAKE NOTICE that on _____ at _____ a.m. the undersigned will apply to the Court at the United States Courthouse in Camden, New Jersey, for an order granting plaintiff leave to amend her complaint to add Beth Benn, R.N., and Beth Slimm, R.N. as defendants to this action. The undersigned will rely on the Motion and Memorandum of Law

attached to this Notice of Motion. A proposed form of order is also attached. Oral argument is requested.

KLINE & SPECTER

By:

A handwritten signature in black ink, appearing to be 'R. Seidel', is written over a horizontal line.

Richard S. Seidel, Esquire
1940 Route 70 East, Suite 200
Cherry Hill, NJ 08003
609/424-9162

Date: February 23, 2004

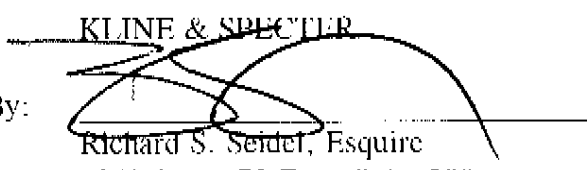
KLINE & SPECTER, P.C.
1800 Chapel Avenue
Cherry Hill, New Jersey 08002
(856) 662-1180
Attorneys for Plaintiffs

DAISY LOVE,	:	UNITED STATES DISTRICT COURT
	:	FOR THE DISTRICT OF NEW JERSEY
Plaintiff,	:	
v.	:	
	:	
RANCOCAS HOSPITAL, et al	:	
	:	
Defendants.	:	CIVIL ACTION NO.: 01CV5456 (SMO)

**MOTION FOR LEAVE TO AMEND COMPLAINT PURSUANT
TO FEDERAL RULE OF CIVIL PROCEDURE 15 TO ADD
BETH BENN, R.N. AND BETH SLIMM, R.N. AS DEFENDANTS**

Plaintiff, Daisy Love, by and through her undersigned counsel, hereby moves this Court, pursuant to Federal Rule of Civil Procedure 15, for leave to amend her Complaint to add Beth Benn, R.N. and Beth Slimm, R.N. as party defendants in this case. In support of the instant motion, plaintiff incorporates herein by reference and makes a part hereof the annexed memorandum of law.

Respectfully submitted,

By: 
KLINE & SPECTER
Richard S. Seidel, Esquire
1940 Route 70 East, Suite 200
Cherry Hill, NJ 08003
609/424-9162

Date: February 23, 2004